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March 24, 2009

Re: SB 661

To: Chairman Stoker and Members of the House Judiciary Committee

From: Anita Kuennen, RN, Executive Director for Blue Mountain Clinic in Missoula

Testimony on behalf of Blue Mountain Clinic to oppose SB661:

We oppose SB 661 on the grounds that regulation specific to abortion care is in response to unwarranted concern about the safety and regulation of abortion care in MT, and is targeted to abortion providers as a further barrier to women's health care access.

Contrary to popular belief, regulations for health care facilities already exist and care provided to women seeking abortion is not exempt from these regulations. Our laboratory and infection control processes is registered with CLIA, our pharmacy is audited by the State board of Pharmacy, and our clinicians and nurses are in good standing with state licensing bodies. In addition we are members in good standing with the National Abortion Federation, who issues standards and guidelines for quality abortion care annually, and who perform compliance audits on member facilities, along with complication statistics reporting. We are also required to report on abortion care to the MT vital statistics bureau.

Abortion care is a small percentage of our practice which entails primary care, acupuncture and mental health counseling.

This bill seeks to specifically target abortion providers and is not based on sound public health principles. Abortion care is a minor procedure by medical definition, the complication rates are extremely low and for our facility lower than the average nationally. We have a thirty three year record of providing safe abortion care. Without an identified problem related to the safety and health of women receiving abortion care, there is no true cause for investigation or regulation, according to public health theory.

There are really three problems with this bill. The first is that they reduce women's access to abortion by making it extremely burdensome and costly to provide abortions. The second is that this bill has the potential to completely destroy the confidentiality of abortion services and compromise women's right to privacy. And the third is that Targeted Regulations of Abortion Providers laws impose those two harms without making abortion any safer at all.

Another basic principle of public health is that if you reduce access to a medical service, that harms the health of the people that need that service, in this case pregnant women.

There are all kinds of procedures that are done on an outpatient basis in doctors' offices: vasectomies; there are all sorts of gynecological procedures that are very much like abortion. When a woman has an incomplete miscarriage and goes to the doctor to have the miscarriage basically completed, the doctor does the exact same procedure as in an abortion. So there are all kinds of procedures that are very much like abortion or exactly the same in terms of what's involved, yet abortion only is targeted for regulation.

The irony of a bill targeting facilities that provide abortion care for DPPHS regulation is that the same people who support this measure are working against the inclusion of abortion care in facilities already regulated by the state. If we were truly concerned about women's safety then we should pass laws that make abortion available in all community health facilities and hospitals and provide public funds for access. The state's not doing that, because the motive is not to provide an abortion in the environment they believe is safest; it's simply to stop abortion.

Safety of abortion care is not really the issue SB 661 intends to address. I urge members of the committee to oppose this bill.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Anita Krume". The signature is fluid and cursive, with a long horizontal stroke at the end.